

## Attachment C

### **Mutual Action Plan (MAP)**

*(To be completed by counsel at least every 90 days, or as required by Litigation Expectations of Defense Counsel.)*

**Sedgwick CMS Claim#:**

**Caption/Case Name:**

**Client Name:**

**Name of Claimant:**

**Venue/Court/Docket #:**

**Date of Loss:**

Dear \_\_\_\_\_,

This will confirm our discussion of \_\_\_\_\_ regarding this matter, during which we agreed on the following. Please accept this as our Mutual Action Plan (MAP).

#### **Brief Statement of Facts:**

**Liability Analysis:** *(Theories available to plaintiff, counsel's opinion as to probable liability expressed as a percentage, including liability on other parties, experts)*

**Available Defenses:** *(Factual/legal defenses available, summary judgment potential, defenses available among/between codefendants/third parties, experts, comparative/contributory negligence)*

**Injuries/Damages:** *(Claimed injuries and damages, mitigating or aggravating factors, medical specials, lost wages, collateral source issues, credibility of medical experts, issues of causation, etc.)*

**Valuation:** *(Likelihood of liability on the client and other parties, full value of the case, jury verdict value, settlement value for the client, potential for contribution/indeemnity/risk transfer, assessment of liability/insurance coverage of other parties, joint & several liability, etc.)*

**Preliminary Resolution Strategy:** At this stage, we agree that this appears to be a case to be targeted for (settlement, mediation, arbitration, trial, etc.) if the agreed strategy has changed, indicate why.

In order to get this matter to a point of resolution, we need to focus on the following issues for prompt resolution: *(Here list both the liability and damage questions that must be answered in order to get the case to a decision point, and if prior issues have been resolved, indicate how.)*

- 1.
- 2.
- 3.
- 4.

**Activities Still to Be Completed:**

<b><u>Activity</u></b>	<b><u>Due Date</u></b>	<b><u>To Be Completed By (claims, counsel, etc.)</u></b>

**Budget:** detailed budget attached

1. Six month estimate of fees & expenses:
2. If prior estimates have changed, provide estimated fees & expenses up to, but not including, trial:

**Next Conference:** As agreed, we will discuss this matter in order to formulate another Mutual Action Plan (MAP) within 90 days, or as required.

## Attachment D

### Deposition Report

*(To be completed by counsel within 10 days of deposition.)*

**Sedgwick CMS Claim#:**

**Caption/Case Name:**

**Client Name:**

**Name of Claimant:**

**Venue/Court/Docket #:**

**Date of Loss:**

**Name of Deponent(s):**

**Date of Deposition**

Dear \_\_\_\_\_,

Please accept this as my deposition report. I will submit condensed transcripts of these as soon as they are available. *(If oral discussion of deposition has also taken place, indicate the date of the conversation.)*

### Characterization of Deponent

- Witness name:
- Address:
- Relation to parties:
- Effectiveness as a witness:
- Age & appearance:
- Detailed summary of the demeanor of the witness:
- Opinion on credibility:
- How the witness will come across in front of a jury:
- Other:

**Brief Summary of Pertinent Portions of Testimony:**

**Significant Issues Affected or Resolved by the Testimony:**

*(Indicate what issues were affected or resolved and how.)*

**Valuation:** *(Does the testimony given change the present settlement/trial evaluation, and if so, why? Likelihood of liability on the client and other parties, full value of the case, jury verdict value, settlement value for the client, potential for contribution/indemnity/risk transfer, assessment of liability/insurance coverage of other parties, joint & several liability, etc.)*

**Resolution Strategy & Action Plan:** *(As a result of the deposition, is there any change in the previously agreed resolution strategy? Is there any necessary discovery, additional investigation, etc.? If so, also attach a budget addressing those additional items.)*

Activity	Due Date	To Be Completed By:

**Next Conference:** We should discuss this matter again on or before \_\_\_\_\_.

## Attachment E

### Arbitration/Court Conference Report

*(To be completed within 5 days of event.)*

**Sedgwick CMS Claim#:**

**Caption/Case Name:**

**Client Name:**

**Name of Claimant:**

**Venue/Court/Docket #:**

**Date of Loss:**

**Date of Event**

**Type of Event:**

Dear \_\_\_\_\_,

This will confirm our discussion of \_\_\_\_\_ regarding this matter, during which we agreed on the following. Please accept this as our report on recent proceedings.

**Submissions made:** *(Arbitration memoranda, settlement packages, etc. submitted by any party. Copies should be forwarded to the Sedgwick CMS representative)*

**Identity of Arbitrators/ Settlement Judge/ Master:** *(Provide summary of their background, i.e. plaintiff/defendant orientation, experience, etc.)*

Identity of witnesses or others present

Witness name:

Address:

Relation to parties:

Effectiveness as a witness:

Detailed summary of the demeanor of the witness:

Opinion on credibility:

Appearance:

How the witness will come across in front of a jury, and briefly summarize the pertinent testimony of this witness?

**Arbitration/Conference Result:** *(Arbitration award or opinion of the settlement conference judge/master, factual or other basis provided for the award, and counsel's opinion on the acceptability of the award.)*

**Jurisdictional Considerations:** *(Date by which appeal must be filed and costs involved in the appeal and future events necessary in the event of an appeal to prepare for trial or settlement, including anticipated costs and fees for each.)*

**Valuation:** *(Does this proceeding change the present settlement/trial evaluation, and if so, why? Likelihood of liability on the client and other parties, full value of the case, jury verdict value, settlement value for the client, potential for contribution/indemnity/risk transfer, assessment of liability/insurance coverage of other parties, joint & several liability, etc.)*

## Attachment F

### Pre-Trial Report

*(To be completed at the first listing or 90 days before trial, whichever is earlier.)*

<b>Trial Date:</b>		<b>Date Of Report:</b>
<b>Prior Trial Dates:</b>		
<b>Caption:</b>		
<b>Claims Examiner:</b>		
<b>Claim #:</b>		
<b>Client:</b>		
<b>Also Defending:</b>		
<b>Date Of Loss:</b>		
<b>Venue &amp; Judge:</b>		
<b>Docket No.:</b>		
<b>File #:</b>		
<b>Previous Demand(S):</b> \$		
<b>Previous Offer(S):</b> \$		
<b>Settlement Goal:</b> \$		
<b>Legal Fees Incurred:</b> \$		

- 1) Venue, jurisdictional considerations, judge & probable jury: *(Provide a description of the venue, including realistic nature of the trial date given, orientation, socioeconomic factors, biography of judge who will try the case, opinion of the probable jury, bifurcation, Docket Number, recent verdicts in the similar matters in venue, etc.)*

- 2) Name and evaluation of plaintiff's and other counsel: *(Provide opinion on experience, style, or other relevant factors regarding all other counsels who will participate in the trial, including personal experience with other counsel.)*
- 3) What counsel will try the case for the client? *(Why should this counsel try the case?)*
- 4) Should/must a representative of the client attend the trial? *(Provide name and explain any problems having a representative of the client attend.)*
- 5) What are the key issues to be resolved by this trial?

**Facts:**

- 6) General overview of the facts.
- 7) Summary of plaintiff's expected fact case with our planned rebuttal: *(Provide descriptive information regarding the plaintiff {age, etc}, a summary of the expected witnesses to be called by the plaintiff, with an indication of the effectiveness & pertinent testimony of each.)*
- 8) Summary of client/defendant's expected fact case with plaintiff's expected rebuttal: *(Provide a summary of the expected witnesses to be called by you, with an indication of the effectiveness & pertinent testimony of each.)*
- 9) Summary of co-defendant's expected fact case with our/plaintiff's expected rebuttal: *(Provide a summary of the expected witnesses to be called by co-defendant, with an indication of the effectiveness & pertinent testimony of each.)*
- 10) Have all significant questions been answered? *(Indicate any issues that have not been resolved, as well as any issues that have been resolved unfavorably to the client.)*
- 11) Identify all liability experts and comment on their effectiveness: *(Indicate plaintiff, client, and other parties' experts together with critical opinions and expected rebuttal to each.)*

**Injury/Damages:**

- 12) General overview of damages: *(Including local law on joint and several liability, pre-judgment interest considerations, statutory damages, responsibility for adverse counsel fees/costs, etc.)*
- 13) Summary of plaintiff's expected damages case with our planned rebuttal: *(Provide a summary of the expected witnesses to be called by the plaintiff, with an indication of the effectiveness & pertinent testimony of each.)*
- 14) Summary of client/defendant's expected damages case with plaintiff's expected rebuttal: *(Provide a summary of the expected witnesses to be called by you, with an indication of the effectiveness & pertinent testimony of each.)*

- 15) Summary of co-defendant's expected damages case with our/plaintiff's expected rebuttal: (*Provide a summary of the expected witnesses to be called by co-defendant, with an indication of the effectiveness & pertinent testimony of each.*)
- 16) Summary of any lost wage/vocational/economic claims with planned rebuttal.
- 17) Amount of economic damages and the amount that will go "on the board" (*i.e. wages, medical expenses.*)
- 18) Have all significant damage questions been answered? (*Indicate any significant questions that have not been resolved, as well as any significant questions that have been resolved unfavorably to the client.*)
- 19) Identify all damage/injury experts and comment on their effectiveness: (*Indicate plaintiff, client, and other parties' experts together with critical opinions and expected rebuttal to each.*)

**General Information:**

- 20) Do you consider the investigation of the case complete, and, if not, what remains to be completed: (*Provide a description of any remaining discovery, including videotaped depositions for trial, probability of remaining discovery being permitted by the court, etc.*)
- 21) Are all witnesses on notice and available? Will they testify live or via videotape or other medium?
- 22) What negotiations (*including mediations or ADR*), if any, have taken place to date, including demands and offers, with your opinion on acceptance: (*Indicate the history of demands and offers, including the most recent demands, and provide your opinions both on the acceptability of the demands and expected future negotiations, and indicate your rationale for any change from the settlement value in the last MAP.*)
- 23) Is this case for settlement or trial, and why? (*Indicate your rationale for any change from opinions previously provided.*)
- 24) What is the percent chance of a defense verdict or directed verdict, and why? (*Indicate your rationale for any change from opinions previously provided.*)
- 25) What is the percent chance of a plaintiff's verdict where the verdict amount is less than your last evaluation, and why?
- 26) What is the probable verdict range if the case is tried and a verdict is returned for the plaintiff? (*Indicate your rationale for any change from opinions previously provided.*)
- 27) Itemize the probable cost of defense to obtain a verdict and length of trial: (*Indicate the expected length of trial, will case be tried during full or partial weeks, cost of defense, providing specificity on expected expenses, i.e. counsel time, experts, videotapes, witness fees, etc.*)
- 28) Are there any collection problems with regard to any codefendants or other parties? (*Limited or no insurance coverage, partial disclaimers, or reservation of rights positions taken*)

- 29) In your opinion, will this case be resolved by this trial? If not, please explain the most likely scenario for resolution.
- 30) Has this case been discussed/roundtabled within Sedgwick CMS? (*If so, in person or by phone, dates, substance of discussion, etc.*)
- 31) Has this case been discussed/roundtabled within your office? (*If so, with who, dates, substance of discussion, etc.*)
- 32) Are all motions In Limine completed?
- 33) Are all jury instructions completed?

## SOUTH FLORIDA OFFICE

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 Altamonte Springs, FL 32714  
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Please reply to South Florida Office

March 02, 2009

Invoice #28406

Invoice submitted to:

SEDWICK CMS  
 ATTN: DEBORAH GAULDIN  
 P.O. BOX 14432  
 LEXINGTON KY 40512-4423

In Reference To: SIMEON JACOBS VS CIRCUIT CITY STORES, INC  
 DOL :09/02/06  
 CLAIM NO:20060915070  
 CASE NO:N/A  
 OUR FILE NO:41.20070920.01B  
 [REDACTED]

Professional Services

			Hrs/Rate	Amount
9/18/2008	CB	Legal Services Telephone conference with co-defendant re: the settlement agreement among co-defendant	0.30 60.00/hr	18.00
9/19/2008	CB	Legal Services Telephone conference with Co-Defendant re: the Release among the co-defendants	0.30 60.00/hr	18.00
	CB	Legal Services Prepare e-mail to client re: the status of the General Release	0.20 60.00/hr	12.00
9/22/2008	JCA	A104 Review/analyze Receipt and Review of correspondence from Houck Anderson regarding to please provide them with a copy of the executed General Release among Co-Defendants L120 Analysis/Strategy	0.20 120.00/hr	24.00
	RP	Legal Services Communications to/from Meador regarding release language. L160 Settlement/Non-Binding ADR	0.40 120.00/hr	48.00
	CB	Legal Services Receipt and review email from client re: the General Release among co-defendants	0.10 60.00/hr	6.00

EXHIBIT

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/22/2008	CB	Legal Services Prepare e-mail to client re: the Release among the co-defendants	0.20 60.00/hr	12.00
9/24/2008	JCA	A101 Plan & Prepare for Prepare letter to carrier re: invoice number 18804 from Accurate COrt Reporting L120 Analysis/Strategy	0.20 120.00/hr	24.00
	CB	Legal Services Receipt and review email from client re: releases	0.10 60.00/hr	6.00
	CB	Legal Services Prepare letter to co-defendant re: enclosed executed release	0.30 60.00/hr	18.00
	CB	Legal Services Telephone conference with opposing counsel concerning the release among the co-defendants	0.30 60.00/hr	18.00
10/1/2008	RP	Legal Services Communications to/from Geer regarding complete execution of release. L470 Enforcement	0.20 120.00/hr	24.00
10/2/2008	CB	A107 Communicate (other external) Telephone conference with Co-Defendant re: the settlement agreement between co-defendants L160 Settlement/Non-Binding ADR	0.30 60.00/hr	18.00
11/19/2008	CB	Legal Services Telephone conference with Judicial Assistant regarding Stipulation and Order of Dismissal (several calls)	0.50 60.00/hr	30.00
	CB	Legal Services Telephone conference with Co-Defendant regarding Stipulation and Order of Dismissal	0.50 60.00/hr	30.00
	CB	Legal Services Telephone conference with opposing counsel concerning the Stipulation and the Order of Dismissal	0.30 60.00/hr	18.00
	CB	Legal Services Online Docket Search regarding stipulation and order of dismissal	0.40 60.00/hr	24.00
	CB	Legal Services Prepare letter to client enclosing executed General Release among Co-Defendants and General Release among Plaintiff and Defendants	0.30 60.00/hr	18.00
	RP	A110 Manage data/files Communications to/from Dondero and Greer as well as Ross regarding status of co-defendant's office's submittal of order for Judge's entry of dismissal. L470 Enforcement	0.50 120.00/hr	60.00

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Please reply to South Florida Office

September 10, 2008

Invoice #27778

Invoice submitted to:

SEDWICK CMS  
ATTN: DEBORAH GAULDIN  
P.O. BOX 14423  
ATLANTA GA 40512-4423

In Reference To: SIMEON JACOBS VS CIRCUIT CITY STORES, INC  
DOL :09/02/06  
CLAIM NO:20060915070  
CASE NO:N/A  
OUR FILE NO:41.20070920.01B  
[REDACTED]

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2008	RR	Legal Services Prepare letter to client enclosing Plaintiff's Proposal for Settlement and explaining legal implications	0.50 110.00/hr	55.00
	RR	Legal Services Research applicable Florida statutes and case law regarding implications of Plaintiff's Proposal for Settlements under Florida Law	0.80 110.00/hr	88.00
6/9/2008	JCA	Legal Services Receipt and review Notice production of Non Party to KDM Maintenance and Service (via fax) L120 Analysis/Strategy	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and review Subpoena Duces Tecum without deposition for KDM Maintenance and Services	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and Review of correspondence from Greenspoon Marder regarding plaintiff's econd request for the tender of the Med pay benefits (via fax)	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and review plaintiff's fourth set of interrogatories to Defendant Circuit City Stores (via fax)	0.20 120.00/hr	24.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/9/2008	RP	Legal Services Communications to/from Ross regarding Proposal and punitive damages theory.	0.40 120.00/hr	48.00
	JCA	Legal Services Receipt and review plaintiff's third set of interrogatories to Defendant Circuit City Stores	0.20 120.00/hr	24.00
	JCA	Legal Services Receipt and review plaintiff's 2nd set of Request for Production to Defendant, sunrise plantation properties	0.20 120.00/hr	24.00
	JCA	Legal Services Receipt and Review of correspondence from Greenspoon Marder enclosing Plaintiff's expert witness list	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and review Notice of filing Simeon Jacobs proposal for settlement to defendant, circuit City Stores L120 Analysis/Strategy	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and Review of correspondence from Greenspoon Marder regarding plaintiff Simeon Jacobs proposal for settlement to defendant L120 Analysis/Strategy	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and review Notice of production from non-party L120 Analysis/Strategy	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and review Subpoena Duces Tecum without deposition to KDM Maintenance and services L120 Analysis/Strategy	0.10 120.00/hr	12.00
6/10/2008	RP	Legal Services Analysis of activities to undertake upon plaintiff's supplemental (3rd Set of Interrogatories) seeking personal information of Leigh and Melton. L310 Written Discovery	0.30 120.00/hr	36.00
	RP	Legal Services Analysis of activities to undertake upon plaintiff's expert witness list. L310 Written Discovery	0.30 120.00/hr	36.00
	RR	Legal Services Analyze and review Plaintiff's Third Set of Interrogatories to Circuit City	0.40 110.00/hr	44.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/10/2008	RR	Legal Services Telephone conference with counsel for co-defendant regarding upcoming depositions and proposal for settlement	0.30 110.00/hr	33.00
	RR	Legal Services Prepare e-mail to client regarding tender of med-pay coverage	0.20 110.00/hr	22.00
	RR	Legal Services Analyze and review Plaintiff's expert witness list	0.40 110.00/hr	44.00
	RR	Legal Services Analyze and review Plaintiff's Second Request for Production to Co-Defendant	0.40 110.00/hr	44.00
	RR	Legal Services Analyze and review Plaintiff's Fourth Set of Interrogatories to Circuit City	0.30 110.00/hr	33.00
	CB	Legal Services Telephone conference with opposing counsel concerning the deposition of Chad Melton and Leigh Helton	0.30 60.00/hr	18.00
	CB	Legal Services Telephone conference with Co-Defendant re: the deposition of Chad Melton and Leigh Helton	0.30 60.00/hr	18.00
	CB	Legal Services Telephone conference with client re: Chad Melton and Leigh Helton's deposition, left voicemail.	0.10 60.00/hr	6.00
	CB	Legal Services Telephone conference with opposing counsel concerning Carrie Lee, Ricardo Alfaro, Leigh Helton, Chad Melton, and Jack Saber's deposition	0.20 60.00/hr	12.00
	CB	Legal Services Telephone conference with co-defendant concerning Carrie Lee, Ricardo Alfaro, Leigh Helton, Chad Melton, and Jack Saber's deposition	0.20 60.00/hr	12.00
6/11/2008	RP	Legal Services File review and analysis regarding post mediation status, including revisions to proposed post mediation status letter to Gauldin.	0.40 120.00/hr	48.00
	JCA	Legal Services Receipt and Review of correspondence from Greenspoon Marder regarding plaintiff's second formal request for the tender of the Med Pay benefits available	0.10 120.00/hr	12.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/11/2008	JCA	Legal Services Receipt and review of plaintiff's fourth set of interrogatories to Defendant Circuit City Stores	0.20 120.00/hr	24.00
	JCA	Legal Services Receipt and Review of correspondence from Houck Anderson regarding the deposition for Carrie Lee, Leigh Helton and Chad Melton (via fax)	0.10 120.00/hr	12.00
	RP	Legal Services Communications to/from Meador regarding rejection from Circuit City to Proposal for Settlement.	0.20 120.00/hr	24.00
6/12/2008	CB	Legal Services Receipt and review several emails from client re: Jack Saber's additional contact information	0.20 60.00/hr	12.00
	JCA	Legal Services Receipt and Review of correspondence from Greenspoon Marder, P.A regarding cancellation of deposition (via fax)	0.10 120.00/hr	12.00
	JCA	Legal Services Receipt and Review of correspondence from Greenspoon Marder P.A. regarding cancellation of depositions (via fax)	0.10 120.00/hr	12.00
	RR	Legal Services Research applicable Florida statutes and case law regarding statute of limitations for filing cross-claim	0.80 110.00/hr	88.00
	RR	Legal Services Prepare e-mail to client enclosing Third and Fourth set of Interrogatories and informing of Plaintiff's deposition requests	0.30 110.00/hr	33.00
	RR	Legal Services Receipt and review email from client regarding deposition of Circuit City employees	0.10 110.00/hr	11.00
	JCA	Legal Services Receipt and Review of correspondence from Houck Anderson P.A regarding written notice that the depositions of Carrie Lee, Leigh Helton and Chad Melton will not be going forward	0.10 120.00/hr	12.00
	AD	Legal Services Prepare Notice of Filing Objections to Plaintiff's Fourth Set of Interrogatories	0.90 110.00/hr	99.00
	RP	Legal Services File review and analysis regarding plaintiff supplemental discovery, including revisions to proposed transmittal e-mail to Meador with instructions on answering 3rd and 4th supplemental interrogatories.	0.30 120.00/hr	36.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/12/2008	RR	Legal Services Review of Plaintiff's Proposal for Settlement	0.30 110.00/hr	33.00
	CB	Legal Services Prepare several e-mails to client re: Jack Saber's additional contact information	0.60 60.00/hr	36.00
	CB	Legal Services Telephone conference with opposing counsel concerning Carrie Lee's deposition	0.20 60.00/hr	12.00
	CB	Legal Services Telephone conference with client concerning Carrie Lee, Chad Melton and Leigh Helton	0.20 60.00/hr	12.00
	CB	Legal Services Update caption, Certificate of Service, caption letter and opposing counsel information to reflect changes.	0.30 60.00/hr	18.00
	CB	Legal Services Prepare e-mail to client re: Carrie Lee	0.20 60.00/hr	12.00
	CB	Legal Services Telephone conference with opposing counsel concerning the depositions of Carrie Lee, Jack Saber, Ricardo Alfaro, Byron Balfour, and Eric Whitaker.	0.40 60.00/hr	24.00
	CB	Legal Services Telephone conference with co-defendant concerning the depositions of Carrie Lee, Jack Saber, Ricardo Alfaro, Byron Balfour, and Eric Whitaker	0.40 60.00/hr	24.00
6/13/2008	RR	Legal Services Telephone conference with counsel for co-defendant regarding Plaintiff's Motion for Punitive Damages (two calls)	0.40 110.00/hr	44.00
	RR	Legal Services Research applicable Florida statutes and case law in preparation for drafting Motion to Strike Plaintiff's Notice of Hearing	0.90 110.00/hr	99.00
	JCA	A104 Review/analyze Receipt and review plaintiff's re-Notice of Taking telephonic Deposition of Jack Saber (via fax)	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review Notice of Taking Deposition of Ricardo Alfaro (via fax)	0.10 120.00/hr	12.00

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			Hrs/Rate	Amount
6/13/2008	JCA	A104 Review/analyze Receipt and review Notice of Taking telephonic Deposition of Ady Perry (via fax) L330 Depositions	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review plaintiff's Notice of taking deposition duces tecum of Sunrise Plantations representative(via fax) L330 Depositions	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review plaintiff's re-Notice of Taking Deposition of Bryon Balfour (via fax) L330 Depositions	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review plaintiff's re-Notice of Taking Deposition of Eric Whitaker (via fax) L330 Depositions	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review plaintiff's re-Notice of Taking Deposition of Leigh Helton (via fax) L330 Depositions	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review plaintiff's re-Notice of Taking Deposition of Chad Melton (via fax) L330 Depositions	0.10 120.00/hr	12.00
	RP	Legal Services Analysis of activities to undertake upon receipt of multiple notices for depositions of multiple lay witnesses from Sunrise Plantation Properties operation as well as Circuit City's.	0.40 120.00/hr	48.00
	RR	Legal Services Prepared Motion to Strike Plaintiff's Notice of Hearing	0.90 110.00/hr	99.00
	RR	Legal Services Prepare Proposed Order on Motion to Strike Plaintiff's Notice of Hearing	0.40 110.00/hr	44.00
	RR	Legal Services Prepared Motion to Continue Hearing on Plaintiff's Motion to Amend Complaint to Add Punitive Damages	0.90 110.00/hr	99.00
	RR	Legal Services Prepare Proposed Order on Motion to Continue Hearing on Plaintiff's Motion to Amend Complaint to Add Punitive Damages	0.40 110.00/hr	44.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/13/2008	RR	Legal Services Research applicable Florida statutes and case law in preparation for drafting Motion to Continue Hearing on Plaintiff's Motion to Amend Complaint to Add Punitive Damages	0.90 110.00/hr	99.00
6/16/2008	RR	Legal Services Telephone conference with Opposing Counsel regarding upcoming hearing on Plaintiff's Amended Motion to Amend Complaint to Add Punitive Damages (two calls)	0.40 110.00/hr	44.00
	RR	Legal Services Prepared Motion to Strike Plaintiff's Notice of Hearing on Amended Motion to Amend Complaint to Add Punitive Damages	0.90 110.00/hr	99.00
	RR	Legal Services Prepare Proposed Order on Motion to Strike Plaintiff's Notice of Hearing on Amended Motion to Amend Complaint to Add Punitive Damages	0.40 110.00/hr	44.00
	RR	Legal Services Prepared Motion to Continue Hearing on Plaintiff's Amended Motion to Amend Complaint to Add Punitive Damages	0.80 110.00/hr	88.00
	RR	Legal Services Prepare Proposed Order on Motion to Continue Hearing on Plaintiff's Amended Motion to Amend Complaint to Add Punitive Damages	0.40 110.00/hr	44.00
	RR	Legal Services Prepare letter to Judge enclosing Motion to Strike Plaintiff's Notice of Hearing on Amended Motion to Amend Complaint to Add Punitive Damages and requesting cancellation of said hearing.	0.40 110.00/hr	44.00
	RR	Legal Services Telephone conference with counsel for co-defendant regarding upcoming hearing	0.40 110.00/hr	44.00
	CB	Legal Services Telephone conference with opposing counsel concerning the hearing on Motion to Amend to Add Punitive Damages	0.30 60.00/hr	18.00
	JCA	A104 Review/analyze Receipt and review Notice of Hearing on plaintiff's amended motion for leave to amend to add claims for punitive damages against Circuit City Stores and Sunrise Plantation L450 Trial and Hearing Attendance	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review Notice of filing deposition of plaintiff Simeon Jacobs	0.10 120.00/hr	12.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/16/2008	JCA	A104 Review/analyze Receipt and review Notice of filing still photographs captured from the September 2, 2006 surveillance DVD of the incident	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review Notice of filing Circuit City 9/2/2006 surveillance video of the incident	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and Review of plaintiff's amended Motion for leave to amend to add claims for punitive damages against Circuit City Stores and Sunrise Plantation Properties	0.30 120.00/hr	36.00
6/17/2008	CB	Legal Services Telephone conference with Co-Defendant to schedule hearing on Plaintiff's Motion for Leave to Amend to Add Claims for punitive damages.	0.20 60.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review add-on Notice of Hearing on Sunrise Plantations' motion to strike plaintiff's motion for leave to amend to add claims for punitive damages against Circuit City (via fax)	0.10 120.00/hr	12.00
	RP	Legal Services Communications to/from Gauldin regarding Meador responding to med pay and Proposal for Settlement question.	0.20 120.00/hr	24.00
	JCA	A104 Review/analyze Receipt and review add-on Notice of Hearing on defendant, Sunrise Plantation's motion to strike plaintiff's motion to leave to amend to add claims for punitive damages against Circuit City Stores	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and Review of defendant Sunrise Plantation Properties' Motion to strike plaintiff's amended motion for leave to amend to add claims for punitive damages against Circuit City Stores and Sunrise Plantation Properties	0.30 120.00/hr	36.00
	JCA	A104 Review/analyze Receipt and Review of defendant Sunrise Plantation Properties response in opposition to plaintiff's amended Motion for leave to amend to add claims for punitive damages against Circuit City Stores and Sunrise Plantation Properties	0.30 120.00/hr	36.00
	CB	Legal Services Telephone conference with Judicial Assistant to schedule hearing on Plaintiff's Motion for Leave to Amend to Add Claims for punitive damages. (several calls)	0.40 60.00/hr	24.00
	JCA	A104 Review/analyze Receipt and Review of defendant Sunrise Plantation Properties' response in opposition to plaintiff's amended motion for leave to	0.30 120.00/hr	36.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
amend to add claims for punitive damages against Circuit City Stores Inc. and Sunrise Plantation Properties (via fax)				
6/17/2008	RR	Legal Services Research applicable Florida statutes and case law in preparation for drafting Circuit City's Response in Opposition to Plaintiff's Amended Motion For Leave to Amend Complaint to Add Claims for Punitive Damages	1.60 110.00/hr	176.00
	RR	Legal Services Review of claims file and discovery in preparation for drafting Circuit City's Response in Opposition to Plaintiff's Amended Motion For Leave to Amend Complaint to Add Claims for Punitive Damages	0.80 110.00/hr	88.00
	RR	Legal Services Prepared Circuit City's Response in Opposition to Plaintiff's Amended Motion For Leave to Amend Complaint to Add Claims for Punitive Damages	1.20 110.00/hr	132.00
	RR	Legal Services Prepare Memorandum of Law in support of Circuit City's Response in Opposition to Plaintiff's Amended Motion For Leave to Amend Complaint to Add Claims for Punitive Damages	0.90 110.00/hr	99.00
	RR	Legal Services Prepare Proposed Order on Circuit City's Response in Opposition to Plaintiff's Amended Motion For Leave to Amend Complaint to Add Claims for Punitive Damages	0.40 110.00/hr	44.00
	CB	Legal Services Telephone conference with opposing counsel to schedule hearing on Plaintiff's Motion for Leave to Amend to Add Claims for punitive damages. (several calls)	0.60 60.00/hr	36.00
	CB	Legal Services Prepare Request for Copies re: records from Plaintiff (KDM Maintenance and Services)	0.60 60.00/hr	36.00
6/18/2008	JCA	A104 Review/analyze Receipt and review defendant, Sunrise Plantation Properties' Notice of serving sworn answers to plaintiff's second set of interrogatories	0.10 120.00/hr	12.00
	RR	Legal Services Telephone conference with client regarding depositions of Circuit City employees	0.30 110.00/hr	33.00
6/20/2008	RR	Legal Services Receipt and review email from adjuster regarding Plaintiff's IME and filing Proposal for Settlement	0.20 110.00/hr	22.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/20/2008	RR	Legal Services Prepare reply e-mail to adjuster regarding IME of Plaintiff and Proposal for Settlement.	0.20 110.00/hr	22.00
	JCA	A104 Review/analyze Receipt and review re-Notice of Hearing on plaintiff's amended motion for leave to amend to add claims for punitive damages against Circuit City Stores and Sunrise Plantation (via fax)	0.10 120.00/hr	12.00
	RR	Legal Services Telephone conference with adjuster, Debbie Gauldin regarding filing Proposal for Settlement	0.30 110.00/hr	33.00
6/23/2008	JCA	A104 Review/analyze Receipt and review re-Notice of Hearing on plaintiff's amended motion for leave to amend to add claims for punitive damages against Circuit City Stores and Sunrise Plantation Properties L450 Trial and Hearing Attendance	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review Notice of certificate of compliance to non-objection L120 Analysis/Strategy	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review of Request for Copies of records produced by KDM Maintenance and Service L140 Document/File Management	0.10 120.00/hr	12.00
6/24/2008	RR	Legal Services Telephone conference with counsel for co-defendant regarding settlement negotiations (two calls)	0.60 110.00/hr	66.00
	RP	Legal Services Communications to/from Meador regarding CC employees' and each's particular role in CC's notice to landlord as to roof leak.	0.20 120.00/hr	24.00
6/25/2008	RR	Legal Services Telephone conference with Opposing Counsel regarding depositions (two calls)	0.60 110.00/hr	66.00
	RR	Legal Services Prepare e-mail to Carrie Lee from Circuit City regarding previous work orders including leaks in the roof	0.20 110.00/hr	22.00
	RR	A103 Draft/revise Prepared Affidavit of Chad Melton L110 Fact Investigation/Development	0.70 110.00/hr	77.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/26/2008	RR	Legal Services Prepare e-mail to counsel for co-defendant regarding settlement negotiations	0.20 110.00/hr	22.00
	RR	A106 Communicate (with client) Prepare e-mail to adjuster regarding employment status of witnesses the Plaintiff has noticed for deposition L330 Depositions	0.20 110.00/hr	22.00
	RR	Legal Services Reviewed file and prepared summary of the knowledge of all the witnesses noticed for deposition by Plaintiff	1.30 110.00/hr	143.00
6/27/2008	JCA	A104 Review/analyze Receipt and Review of correspondence from Houck Anderson P.A regarding unavailability for trial (via fax)	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review Notice of unavailability (via fax)	0.10 120.00/hr	12.00
	RP	Legal Services File review and analysis regarding attempts to claim punitive damages, including revisions to proposed Response to Plaintiff's Amended Motion to Amend Complaint to Assert Punitive Damages. L210 Pleadings	0.30 120.00/hr	36.00
	RP	Legal Services File review and analysis regarding unilaterally scheduled employee depositions, including review of Motion for Protective Order. L330 Depositions	0.20 120.00/hr	24.00
	RR	Legal Services Prepare Motion For Protective Order in regards to Circuit City employee Jack Saber, including review of Notice of Taking Deposition in preparation	0.90 110.00/hr	99.00
	RR	Legal Services Prepare Proposed Order on Motion For Protective Order in regards to Circuit City employee Jack Saber	0.40 110.00/hr	44.00
	RR	Legal Services Prepare Motion For Protective Order in regards to Ricardo Alfaro, including review of Notice of Taking Deposition in preparation	0.90 110.00/hr	99.00
	RR	Legal Services Prepare Proposed Order on Motion For Protective Order in regards to Circuit City employee Ricardo Alfaro	0.40 110.00/hr	44.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/27/2008	RR	Legal Services Prepare e-mail to adjuster regarding employment status of several witness	0.20 110.00/hr	22.00
	RR	Legal Services Receipt and review of email from adjuster regarding employment status of several witnesses	0.20 110.00/hr	22.00
	JCA	A104 Review/analyze Receipt and Review of defendant, Sunrise Plantation Properties Motion to be excused from portion of trial docket (via fax)	0.30 120.00/hr	36.00
6/30/2008	CB	Legal Services Telephone conference with opposing counsel concerning the deposition of the Circuit City former and current employees.	0.20 60.00/hr	12.00
	JCA	A104 Review/analyze Receipt and Review of correspondence from Houck Anderson P.A enclosing an add-on notice of hearing (via fax)	0.10 120.00/hr	12.00
	JCA	Legal Services Prepare letter to carrier re: invoice no. 132931 from Florida mediation Group for mediator	0.20 120.00/hr	24.00
	JCA	Legal Services Prepare letter to carrier re: invoice no. 0047040684 from HealthPort for copies	0.20 120.00/hr	24.00
7/1/2008	CB	Legal Services Prepare Notice of Hearing on Motion for Protective Order	0.30 60.00/hr	18.00
	CB	Legal Services Telephone conference with Co-Defendant re: the hearing on the Motion for Protective Order	0.30 60.00/hr	18.00
	JCA	Legal Services Prepare letter to carrier re: invoice number 0025-FMC-163715 from IOD Incorporated L320 Document Production	0.20 120.00/hr	24.00
	JCA	A104 Review/analyze Receipt and Review of correspondence from Houck Anderson, P.A enclosing Add-on notice of hearing and motion to be excussed from portion of trial docket L120 Analysis/Strategy	0.10 120.00/hr	12.00
	JCA	A104 Review/analyze Receipt and review add-on Notice of Hearing on Sunrise Plantation's motion to be excused from portion of trial docket L450 Trial and Hearing Attendance	0.10 120.00/hr	12.00